

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LINDSEY SHEPARD AND PAUL JONES,

Plaintiffs,

vs.

DOUGLAS K. HOWARTH, ANTHONY
SCANZANI, CITY LINE AUTO SALES,
AND FREDERICK J. HANNA

Defendants.

CIVIL ACTION NO.: 1:14-cv-10301-RGS

DEFENDANT'S PRE-TRIAL SCHEDULE

Pursuant to this Court's Order (DE #36), Defendant, Frederick J. Hanna & Associates, P.C.¹, respectfully submits the following proposed Pre-Trial Schedule.

I. Proposed Discovery/Motion Schedule

- a. Initial disclosures shall be exchanged by August 11, 2014.
- b. All non-expert depositions² and fact discovery on Plaintiff's claim shall be completed by January 9, 2015.
- c. Dispositive motions on liability shall be filed on or before February 9, 2015.

II. Trial by Magistrate Judge

The Defendant does not consent to trial by Magistrate Judge

¹ Improperly identified herein as Frederick J. Hanna.

² The Defendant does not anticipate calling an expert witness in this matter but will timely notify the Court if it intends to do so and request that the discovery schedule be adjusted accordingly. The Defendant expressly reserves its right to call an expert witness.

III. Rule 16.1(D)(3) Certifications

The Defendant will file its certification pursuant to LR, D. Mass 16.1(D)(3) under separate cover.

Respectfully submitted,
FREDERICK J. HANNA & ASSOCIATES,
P.C.
By Its Attorneys

/s/ Andrew M. Schneiderman
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July 28, 2014

CERTIFICATE OF SERVICE

I, Andrew M. Schneiderman, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). A true and accurate copy of the foregoing document to counsel of record by first class mail, postage prepaid and electronic mail as follows:

Paul Jones
Lindsey Shepard
572 Park Street
Stoughton, MA 02072

/s/ Andrew M. Schneiderman
Andrew M. Schneiderman